

Exhibit B



Aaron Wright <aaron@holcombward.com>

RE: Draft 30(b)(6) Notice of ACLP

1 message

Bryan Ward <bryan.ward@holcombward.com>

Tue, Sep 17, 2024 at 5:34 PM

To: "Daniel J. Vedra" <dan@vedralaw.com>

Cc: Paul Rachmuth <paul@paresq.com>, Bryan McKenna <bam@mckennalegal.nyc>, Aaron Wright <aaron@holcombward.com>, Holly Cole <holly@holcombward.com>

Dan,

I've attached a letter providing further support for our position. We can discuss any remaining issues tomorrow at our call. Thanks,

Bryan M. Ward | Holcomb + Ward | 404-892-5695**From:** Bryan Ward <bryan.ward@holcombward.com>**Sent:** Tuesday, September 17, 2024 3:10 PM**To:** 'Daniel J. Vedra' <dan@vedralaw.com>**Cc:** 'Paul Rachmuth' <paul@paresq.com>; 'Bryan McKenna' <bam@mckennalegal.nyc>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>**Subject:** RE: Draft 30(b)(6) Notice of ACLP

Sounds good. Talk to you then. Let's use my conference number: 404-566-9907. I'll send a calendar invite.

Bryan M. Ward | Holcomb + Ward | 404-892-5695**From:** Daniel J. Vedra <dan@vedralaw.com>**Sent:** Tuesday, September 17, 2024 3:00 PM**To:** Bryan Ward <bryan.ward@holcombward.com>**Cc:** Paul Rachmuth <paul@paresq.com>; Bryan McKenna <bam@mckennalegal.nyc>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>**Subject:** RE: Draft 30(b)(6) Notice of ACLP

2:30 to 3:30 MT works.



1444 Blake Street
Denver, CO 80202

Office: (303) 937-6540

Direct: (720) 295-9391

Fax: (303) 937-6547

From: Bryan Ward <bryan.ward@holcombward.com>
Sent: Tuesday, September 17, 2024 12:39 PM
To: Daniel J. Vedra <dan@vedralaw.com>
Cc: Paul Rachmuth <paul@paresq.com>; Bryan McKenna <bam@mckennalegal.nyc>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>
Subject: RE: Draft 30(b)(6) Notice of ACLP

Anytime tomorrow from 9:00 – 12:30 or 2:30 – 3:30 (all Mountain) would work for us. Just let us know what time works for you. Thanks,

Bryan M. Ward | Holcomb + Ward | 404-892-5695

From: Daniel J. Vedra <dan@vedralaw.com>
Sent: Tuesday, September 17, 2024 1:34 PM
To: Bryan Ward <bryan.ward@holcombward.com>
Cc: Paul Rachmuth <paul@paresq.com>; Bryan McKenna <bam@mckennalegal.nyc>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>
Subject: RE: Draft 30(b)(6) Notice of ACLP

Bryan:

Please provide your availability in the next 48 hours. During this phone call, I will ask you for legal authority to support the following objections:

Therefore, although ACLP is not taking the position at this time, it would be within its rights to refuse to sit for any further questioning. Instead, ACLP is willing to agree to sit for additional 30(b)(6) time and is willing to work with you in determining exactly how much extra time your client will have.

ACLP is also asking that you narrow the list of topics to be covered by the 30(b)(6) deposition down to topics that were not already covered in the Colorado case. Your client can use the deposition testimony it already took on September 19, 2022 for the subjects that were noticed for the Colorado case.

Sub-topics must fall within the topics.



VEDRA LAW LLC

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From: Bryan Ward <bryan.ward@holcombward.com>

Sent: Tuesday, September 17, 2024 11:29 AM

To: Daniel J. Vedra <dan@vedralaw.com>

Cc: Paul Rachmuth <paul@paresq.com>; Bryan McKenna <bam@mckennalegal.nyc>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>

Subject: RE: Draft 30(b)(6) Notice of ACLP

I'm going to stand by our objections. Just let me know if you'd prefer to respond in writing or if you want to have a meet and confer to discuss and, if so, when would work for you. Thanks,

Bryan M. Ward | Holcomb + Ward | 404-892-5695

From: Daniel J. Vedra <dan@vedralaw.com>

Sent: Tuesday, September 17, 2024 1:17 PM

To: Bryan Ward <bryan.ward@holcombward.com>

Cc: Paul Rachmuth <paul@paresq.com>; Bryan McKenna <bam@mckennalegal.nyc>; Aaron Wright

<aaron@holcombward.com>; Holly Cole <holly@holcombward.com>

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The best thing to do right now would be for you to provide legal authority for any of the objections that you intend to make.

IT was draft only as to date. I should have made that clear.



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From: Bryan Ward <bryan.ward@holcombward.com>

Sent: Tuesday, September 17, 2024 11:11 AM

To: Daniel J. Veda <dan@vedralaw.com>

Cc: Paul Rachmuth <paul@paresq.com>; Bryan McKenna <bam@mckennalegal.nyc>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>

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Dan,

I think our objections and positions are clear, but let me know where you need more clarity or references. I note that your objections to our 30(b)(6) topics did not have legal authority for each of its objections, and, indeed, included just one citation.

I've now noted that this was not intended as a draft notice. I was going off your 8/29 email stating, "Please find attached a draft notice of deposition to Alexander Capital, L.P."

Now that we know it was not intended as a draft notice of deposition, let's confer on how to resolve our objections. Just let me know if you'd prefer to respond in writing or if you want to have a meet and confer to discuss and, if so, when would work for you. Thanks,

Bryan M. Ward | Holcomb + Ward | 404-892-5695

From: Daniel J. Vedra <dan@vedralaw.com>
Sent: Tuesday, September 17, 2024 11:06 AM
To: Bryan Ward <bryan.ward@holcombward.com>
Cc: Paul Rachmuth <paul@paresq.com>; Bryan McKenna <bam@mckennalegal.nyc>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>
Subject: RE: Draft 30(b)(6) Notice of ACLP

Bryan:

Please provide legal authority for each of the objections you intend to raise. Also, this was not a draft notice.

Dan



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Fax: (303) 937-6547

From: Bryan Ward <bryan.ward@holcombward.com>
Sent: Tuesday, September 17, 2024 8:54 AM
To: Daniel J. Vedra <dan@vedralaw.com>
Cc: Paul Rachmuth <paul@paresq.com>; Bryan McKenna <bam@mckennalegal.nyc>; Aaron Wright <aaron@holcombward.com>; Holly Cole <holly@holcombward.com>
Subject: Draft 30(b)(6) Notice of ACLP

Dan,

Please see the attached letter regarding FOL's draft 30(b)(6) notice to ACLP. If you want, I'm happy to discuss at your convenience. Thanks,

Bryan M. Ward



3455 Peachtree Road NE, Suite 500

Atlanta, Georgia 30326

404-892-5695 (Direct)

404-601-2803 (Main)

404-393-1554 (Fax)

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24-09-17 Second Letter from B. Ward to D. Vedra re Draft 30(b)(6) to ACLP.pdf

210K